

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CATHERINE PETZEL,)	CASE NO. 2:12-cv-1066
)	
<i>Plaintiff,</i>)	JUDGE PETER C. ECONOMUS
)	
v.)	
)	<u>DECLARATION OF KAREN FINLEY</u>
REDFLEX TRAFFIC SYSTEMS, INC., <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

I, Karen Finley, declare as follows:

1. I am over the age of 18 and have personal knowledge of the information contained in this Declaration. All statements are true and correct to the best of my knowledge, information and belief. If called as a witness, I could competently testify about the truthfulness of these facts.

2. At all relevant times, I have been a resident of Arizona.

3. Defendant Redflex Traffic Systems, Inc. ("Redflex") is headquartered in Phoenix, Arizona.

4. I worked for Redflex and/or its predecessors from October, 1998 until February 28, 2013. I was first employed as Director of Operations until approximately 2000 or 2001, at which time I was promoted to Vice President of Operations. In March, 2006, I was promoted to the position of Chief Executive Officer for Redflex, and I remained in that position until the end of my employment with the company.

5. At all times during my employment with Redflex, I lived in Arizona and worked out of the company's headquarters in Arizona. I do not own any property in Ohio.

6. When I was Vice President of Operations, I recall making brief visits to a customer in Toledo a few times between 2001 and 2005. I also made a brief trip to Cleveland in January, 2013, when I was Chief Executive Officer.

7. To the best of my recollection, other than the trips described above, I have not visited anywhere else in Ohio since 2001.

8. There may have been times when I emailed Plaintiff Catherine Petzel and/or other Redflex sales staff in Ohio from Redflex's headquarters in Arizona, but any such emails were rare, as I did not have regular direct involvement with Redflex's sales staff.

9. Plaintiff Catherine Petzel was a Sales Manager for Redflex from January, 2009 until her employment was terminated on December 31, 2011.

10. After it became clear that Ms. Petzel's job performance was unsatisfactory and was not improving, Aaron Rosenberg, Redflex's Executive Vice President of Sales and Business Development, and I discussed terminating Ms. Petzel's employment. All such discussions took place at Redflex's headquarters in Arizona. The company's decision to terminate Ms. Petzel's employment was also made at its headquarters in Arizona.

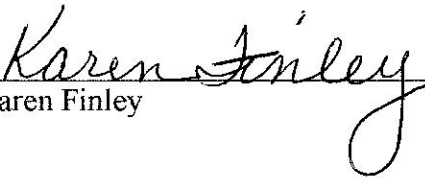
11. At no time during my employment with Redflex did I regularly conduct or solicit business in Ohio or engage in any other persistent course of conduct in Ohio, nor have I derived any substantial revenue from goods used or consumed or services rendered in Ohio.

12. At no time during my employment with Redflex did I have any continuous and systematic contacts with Ohio.

13. I have reviewed the Complaint filed by Ms. Petzel in this action. To the extent Ms. Petzel alleges that I engaged in any conduct, all such alleged conduct would have taken place outside of Ohio.

14. If I have any documents that would be relevant to this case, such documents would necessarily be located in Arizona. Similarly, any material witnesses that would be relevant to this case would be located in Arizona.

I declare under penalty of perjury and under the laws of the United States and the State of Arizona that my foregoing Declaration is true and correct. I have executed my Declaration on this 18 day of April, 2013.


Karen Finley

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